

FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA |
|
v. | No. 3:22-CR-00327-1
| JUDGE TRAUGER
[1] CHESTER GALLAGHER |
[2] HEATHER IDONI |
[3] CALVIN ZASTROW |
[4] COLEMAN BOYD |
[6] PAUL VAUGHN |
[7] DENNIS GREEN |

**MOTION REQUESTING PERMISSION TO MANUALLY FILE THUMB DRIVE IN
SUPPORT OF MOTION FOR PRETRIAL RULING ON ADMISSIBILITY OF
GALLAGHER VIDEO CLIPS AND PERMISSION TO PLAY CLINIC WORKER
VIDEO WITH AUDIO**

Come now the Defendants, Chester Gallagher, Heather Idoni, Calvin Zastrow, Coleman Boyd, Paul Vaughn and Dennis Green, by and through undersigned counsel, and hereby request permission of the Court to manually file a thumb drive containing the recordings and transcripts referenced in the defendants' Motion for Pretrial Ruling on Admissibility of Gallagher Video Clips and Permission to Play Clinic Worker Video with Audio (DE 452).

Respectfully submitted,

/s/ Jodie A. Bell
JODIE A. BELL, No. 18336
Washington Square Building
214 Second Avenue North, Suite 208
Nashville, Tennessee 37201
(615) 953-4977
(615) 928-1901 facsimile
jodie@attorneyjodiebell.com
Attorney for Gallagher

/s/ William J. Conway (by permission)

William J. Conway, Esq. P.C.
214 Second Avenue North, Suite 208
Nashville, TN 37201
(615) 260-5364
wjconway@gmail.com
Attorney for Defendant Heather Idoni

/s/ Robert L. Parris (by permission)

Robert L. Parris, Attorney at Law
200 Jefferson Avenue, Suite 1500
Memphis, TN 38103
(615) 490-8026
rlp@robertparrisattorney.com
Attorney for Defendant Calvin Zastrow

/s/ Kerry Haymaker (by permission)

Haymaker & Heroux, P.C.
545 Mainstream Drive, Suite 420
Nashville, TN 37228
(615) 250-0050
haymaker@tennesseedefense.com
Attorney for Defendant Coleman Boyd

/s/ Stephen M. Crampton (by permission)

STEPHEN M. CRAMPTON
Thomas More Society
P.O. Box 4506
Tupelo, MS 38803
662-255-9439
scrampton@thomasmoresociety.org
Attorney for Defendant Paul Vaughn

/s/ Manuel B. Russ (by permission)

MANUEL B. RUSS
340 21st Avenue North
Nashville, TN 37203
(615) 329-1919
russben@gmail.com
Attorney for Defendant Dennis Green

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically and served on the following by the EF/CME electronic filing system:

William Conway

214 Second Avenue North, Suite 208
Nashville, TN 37201
((615)260-5363
wjconway@gmail.com
Attorney for Heather Idoni

ROBERT LYNN PARRIS

Robert L. Parris, Attorney at Law
200 Jefferson Avenue
Suite 1500
Memphis, TN 38103
(615) 490-8026
rlp@robertparrisattorney.com
Attorney for Defendant Calvin Zastrow

G. KERRY HAYMAKER

Haymaker & Heroux, P.C.
545 Mainstream Drive
Suite 420
Nashville, TN 37228
(615) 250-0050
haymaker@tennesseedefense.com
Attorney for Defendant Coleman Boyd

LARRY LAMONT CRAIN

5214 Maryland Way
Suite 402
Brentwood, TN 37207
(615) 376-2600
larry@crainlaw.legal

STEPHEN M. CRAMPTON

Thomas More Society
P.O. Box 4506
Tupelo, MS 38803
662-255-9439
scrampton@thomasmoresociety.org
Attorney for Defendant Paul Vaughn

MANUEL B. RUSS
340 21st Avenue North
Nashville, TN 37203
(615) 329-1919
russben@gmail.com
Attorney for Defendant Dennis Green

AMANDA J. KLOPF
U.S. Attorney's Office (Nashville)
719 Church Street
Suite 3300
Nashville, TN 37203
(615) 736-5151
amanda.klopf@usdoj.gov
Representing USA (*Plaintiff*)

KYLE BOYNTON
WILFRED BEAYE
Department of Justice
150 M Street NE
Washington, DC 20002
(202) 598-0449
Representing USA (*Plaintiff*)

This the 9th day of January, 2024.

/s/ Jodie A. Bell
JODIE A. BELL